

Exhibit A

Alex Moore

From: Alex Moore
Sent: Thursday, November 21, 2024 9:12 AM
To: Alex Moore
Subject: FW: NOI - MVD & TMD
Attachments: 11-20-2024 CAT v TMD, Stip and Proposed Order to Extend Time.docx; 11-20-2024 CAT v TMD, Stip and Proposed Order to Extend Time.pdf

----- Forwarded message -----

From: **William Carlon** <william@carlonlaw.com>
Date: Wed, Nov 20, 2024 at 2:35 PM
Subject: Re: NOI - MVD & TMD
To: Stephanie Moreda-Arend <stephanie@moredavalleydairy.com>
Cc: 707.TMD@gmail.com <707.TMD@gmail.com>, William Verick <wverick@igc.org>, brian <brian@brianacree.com>, David Williams <dhwill7@gmail.com>

In order to change a deadline set by the Court, we are required to make a request pursuant to Civil Local Rule 6-2 that sets out, among other things, the reasons for the requested extension. In order for the Court to grant such a request, there needs to be good cause for the extension. Here, you have not explained why there is good cause to extend all deadlines in the case, and we will not agree to an extension without good cause.

We have made every reasonable effort to accommodate your requests for extra time to date, and we are able, pursuant to Civil Local Rule 6.1(a), to stipulate to an extension of Defendants' response without a court order (though the corresponding extension for Plaintiff's opposition would require a court order because it involves papers required to be filed with the Court, see Civil Local Rule 6-1(b)).

Attached is a redline version of the stipulation that we are willing to accept, and a clean version for Mr. Moreda's approval. Again, because you are not the defendant, and you are not a lawyer, you cannot grant authority to file this, so I'll need to have Mr. Moreda's signature, or some other representation from Mr. Moreda evidencing his concurrence with this filing.

From: Stephanie Moreda-Arend <stephanie@moredavalleydairy.com>
Sent: Tuesday, November 19, 2024 7:44 PM
To: William Carlon <william@carlonlaw.com>
Cc: 707.TMD@gmail.com <707.TMD@gmail.com>; William Verick <wverick@igc.org>; brian <brian@brianacree.com>; David Williams <dhwill7@gmail.com>
Subject: Re: NOI - MVD & TMD

We are surprised and disappointed in your response. We agreed to give you the extension you requested, and both sides should be generous over the holidays. Attached is a revised stipulation, if you don't agree to extend all deadlines, could you please tell us the reason why? Otherwise, please either file this tomorrow or tell us you refuse so that we can hurry and get a lawyer to file a motion for the extension.

Respectfully,

Stephanie Moreda-Arend

Moreda Valley Dairy; General Manager
T: 707-782-0322
C: 707-695-3510

Agriculture is the most healthful, most useful and most noble employment of man.” – George Washington

On Tue, Nov 19, 2024 at 3:13 PM William Carlon <william@carlonlaw.com> wrote:

Ms. Moreda-Arend,

Attached is a draft of the stipulation and proposed order that I referenced earlier, as well as a supporting declaration that is required by the Local Civil Rules. Let me know if you have any revisions. Because Mr. Moreda is the defendant, and is not represented by an attorney, and because you are not his attorney, I will need to have Mr. Moreda himself review this and then provide his concurrence for filing (pursuant to Local Civil Rule 5-1(i)(3)).

From: William Carlon <william@carlonlaw.com>
Sent: Tuesday, November 19, 2024 10:36 AM
To: Stephanie Moreda-Arend <stephanie@moredavalleydairy.com>
Cc: 707.TMD@gmail.com <707.TMD@gmail.com>; William Verick <wverick@igc.org>; brian <brian@brianacree.com>; David Williams <dhwill7@gmail.com>
Subject: Re: NOI - MVD & TMD

At this time we are only prepared to stipulate to an extension of your responsive pleading, and Plaintiff's response, should one be needed. Under the circumstances, Plaintiff does not believe that good cause exists to seek a modification of the Court's case management order.

I will prepare the stipulation and proposed order and send it over for your review and approval.

From: Stephanie Moreda-Arend <stephanie@moredavalleydairy.com>
Sent: Monday, November 18, 2024 1:50 PM
To: William Carlon <william@carlonlaw.com>
Cc: 707.TMD@gmail.com <707.TMD@gmail.com>; William Verick <wverick@igc.org>; brian <brian@brianacree.com>; David Williams <dhwill7@gmail.com>
Subject: Re: NOI - MVD & TMD

Hello Mr. Carlon,

We received your email and accept your agreement to provide a 30-day extension which we assume applies to all existing dates set by the court order. We ask for this time to have settlement discussions without legal procedures such as Rule 26 that will drain our limited resources. Please send me your draft stipulation and proposed order tomorrow for our review and any suggested edits. For the response, we ask for an extension to December 27 instead of December 25 because of the Christmas holiday. For all other dates, 30 days is fine. We will respond to the rest of your letter in a follow-up email with suggestions on our settlement discussions.

Respectfully,

Stephanie Moreda-Arend
Moreda Valley Dairy; General Manager
T: 707-782-0322

C: 707-695-3510

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On Fri, Nov 15, 2024 at 3:52 PM William Carlon <william@carlonlaw.com> wrote:

Dear Ms. Moreda-Arend,

Please find attached my correspondence of today's date.

Thank you,
William Carlon

From: Stephanie Moreda-Arend <stephanie@moredavalleydairy.com>

Sent: Thursday, November 14, 2024 11:54 AM

To: William Carlon <william@carlonlaw.com>

Cc: 707.TMD@gmail.com <707.TMD@gmail.com>; William Verick <wverick@igc.org>; brian <brian@brianacree.com>; David Williams <dhwill7@gmail.com>

Subject: Re: NOI - MVD & TMD

Hello Mr. Carlon,

I apologize for the delay. We have been discussing how to respond to your filing and what our capabilities are in being able to respond. We would like to settle this case with you and we would like to ask for more time. We believe an additional 30 days would make the world of a difference for us. As you may know and hopefully understand; we are in the beginning stages of preparing for the winter, holidays and year end farming activities, which require us to be vigilant and focused in order to maintain best practices for our farm.

Your lawsuit threatens Travis' life's work in building a dairy into a business and its ability to continue in whole. Dairy farms are coming off a 10 year economic downturn and small business' have been experiencing difficulties (as I'm sure you are aware). It's really important he spends his time and resources on maintaining his operation and trying to implement improvements that will satisfy your demands, rather than paying for attorneys.

Our community is better by preserving these family dairies rather than putting them out of business, which will not benefit you or your client. We propose both sides share information, you share your specific/detailed concerns and we can share our efforts and additional measures with you, to see if you can be satisfied that a settlement can be reached.

I hear your question about coming to the property, but we have trust issues and I would like some additional information:

1. What is the name of your consultant and his/her hourly rate?
2. What is the cost of the consultant for the site visit? Are you willing to pay that cost?
3. Do you intend to charge us for your attorney fees for the site visit? What is your rate and what is that cost?
4. How many people or attorneys would be in attendance?
5. What specifically are you interested in seeing?

We are unsure whether we can afford these additional costs. We need to spend our limited monies on site improvements.

Please let us know by this Monday, November 18, whether you will agree to our request for a 30-day extension of the existing deadlines. We understand if you oppose the extension, we will have to get a lawyer to ask the court for this extension and inform the court you oppose it.

This is all very important so that Travis can save his family farm.

Respectfully,

Stephanie Moreda-Arend

Moreda Valley Dairy; General Manager

T: 707-782-0322

C: 707-695-3510

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On Mon, Nov 11, 2024 at 4:29 PM William Carlon <william@carlonlaw.com> wrote:

Hello,

I am following up on my email from two weeks ago because I have not yet received a response. I would like to schedule a time to conduct our Federal Rule of Civil Procedure 26(f) conference, or in the alternative, I would like to meet and confer pursuant to Civil Local Rule 37-1(a) with regards to a motion to compel a Rule 26(f) conference. Please let me know your earliest availability.

Thank you,
William Carlon

From: William Carlon <william@carlonlaw.com>

Sent: Monday, October 28, 2024 2:02 PM

To: Stephanie Moreda-Arend <stephanie@moredavalleydairy.com>; 707.TMD@gmail.com <707.TMD@gmail.com>

Cc: William Verick <wverick@igc.org>; brian <brian@brianacree.com>; David Williams <dhwil7@gmail.com>

Subject: Re: NOI - MVD & TMD

Hello Mr. Moreda and Ms. Moreda-Arend,

I received the returned waiver of service this morning and have filed it with the Court. I noticed that Mr. Moreda executed the waiver, and it was not signed by an attorney. Have you retained an attorney yet? If so, please let me know who you retained so that I can direct my correspondence accordingly.

In the meantime, my client remains interested in discussing settlement, and in setting up a settlement-protected site visit. I didn't receive a response to my last inquiry, so I wanted to follow up on that again.

In addition, I would like to schedule a time to conduct our Federal Rule of Civil Procedure 26(f) conference. Are you available this week or next?

Thank you,
William Carlon

From: William Carlon <william@carlonlaw.com>

Sent: Thursday, September 26, 2024 4:20 PM

To: Stephanie Moreda-Arend <stephanie@moredavalleydairy.com>

Cc: William Verick <wverick@igc.org>; brian <brian@brianacree.com>; David Williams <dhwil7@gmail.com>

Subject: Re: NOI - MVD & TMD

Hello Ms. Moreda-Arend,

I'm writing to inform you that Californians for Alternatives to Toxics has filed a complaint against Travis Moreda Dairy and Travis Moreda in the Northern District of California United States Federal District Court on September 20, 2024. A copy is attached for your review.

Also attached to this email, and transmitted via USPS, is a request for waiver of service of summons which is a way of saving expenses associated with hiring a process server, and provides the parties some additional time to discuss settlement before any required legal filings.

My client remains interested in setting up a site visit - have you given that any additional consideration?

Thank you,
William Carlon

From: William Carlon <william@carlonlaw.com>
Sent: Wednesday, August 28, 2024 3:09 PM
To: Stephanie Moreda-Arend <stephanie@moredavalleydairy.com>
Cc: William Verick <wverick@igc.org>; brian <brian@brianacree.com>; David Williams <dhwill7@gmail.com>
Subject: Re: NOI - MVD & TMD

Hello Stephanie,

I'm sorry to hear about your employee, and I'm sorry for your loss.

Please let us know if you change your mind about setting up a site visit.

Thank you,
William Carlon

From: Stephanie Moreda-Arend <stephanie@moredavalleydairy.com>
Sent: Wednesday, August 28, 2024 12:25 PM
To: William Carlon <william@carlonlaw.com>
Subject: Re: NOI - MVD & TMD

Hello William,

I'm responding to your August 13 email (sorry for the delay) - our employee of almost 30 years unexpectedly died and we are focused on his family and helping everyone through this difficult time. We are spending our resources and giving our full attention to working with our consultant, and are not ready to schedule a site visit. Who is your consultant?

Respectfully,

Stephanie Moreda-Arend
Moreda Valley Dairy; General Manager
T: 707-782-0322
C: 707-695-3510
F: 707-598-0660

Nothing will work, unless you do. ~Maya Angelou

www.linkedin.com/in/StephMVD

On Tue, Aug 13, 2024 at 3:19 PM William Carlon <william@carlonlaw.com> wrote:

Dear Ms. Moreda-Arend,

Thank you for your email. My client is interested in resolving this matter as efficiently as possible. To that end, we are willing to discuss an early resolution prior to filing a complaint, but we would need to have made significant progress toward reaching an agreement in order to defer filing.

In any case, I would urge you to seek legal counsel.

Given that the sixty-day notice period ends September 9th, time is of the essence. The first step toward reaching an agreement would be to schedule a site visit to allow our consultant to make recommendations, and to provide the basis for a proposed agreement. Ideally, you would have a consultant present as well to help answer any questions that may come up. We would agree that the site visit would be confidential and protected as a settlement communication, and the photographs, observations, and discussions from such a visit could not be used against you in court, if it comes to a lawsuit. If you are amenable to a site visit, please provide a few dates and times that I can run by my consultant.

My client, like you, believes that our natural resources need to be protected, and our focus here is to do just that. If you are willing to work with us to achieve that goal, then I'm sure we can find a way forward that is acceptable to all parties.

Thank you,
William Carlon

From: Stephanie Moreda-Arend <stephanie@moredavalleydairy.com>

Sent: Monday, August 12, 2024 8:45 PM

To: William Carlon <william@carlonlaw.com>; William Verick <wverick@igc.org>; brian <brian@brianacree.com>; davidhwilliams@earthlink.net <davidhwilliams@earthlink.net>

Subject: NOI - MVD & TMD

Dear Attorney Carlson, Attorney Verick, Attorney Acree and Attorney Williams,

My family received your notice dated July 11, 2024, regarding your intention to sue us because you assert our dairy operations violated the Clean Water Act. This threat had caused enormous hurt and stress to all of us. For more than 100 years, five generations of my family have spent their lives and hard work into growing the crops that have made Sonoma world famous. We built our family dairy from nothing into our livelihood, to provide milk and dairy products to our community and our county. We have great respect for the land and water quality that sustains our farm and dairy, and believe those natural resources should be cherished and protected. We want to give our children the same opportunity we had, to farm the land and care for our livestock as a way of life.

We know you are lawyers, and we are not. If you sue us, we will have to hire a lawyer to respond to your lawsuit. We are just recovering from the Covid pandemic, the difficult economy and other financial issues that have pushed us to the brink of collapse. We understand another dairy was forced into closure because of this type of lawsuit. We are very fearful of your threats and the possibility that the cost of defending a lawsuit may have the same outcome, to bankrupt us, force us to sell our land and bring an end to our life's work.

Rather than spending our scare resources on lawyers, we propose to try and negotiate a solution with you, to explore additional measures we can implement at our dairy. We need time to find an expert consultant to help us understand the issues and possible fixes (and their cost). We will then be in a position to share our plan and try and reach a settlement with you.

We ask that you agree not to file a lawsuit against us for 90 days, up to November 11, 2024 (Veterans Day). In return, we promise to negotiate in good faith with you to better understand your demands and to try and find a mutually agreeable resolution. Please let us know if this is acceptable to you.

Best Regards,

Stephanie Moreda-Arend

Moreda Valley Dairy; General Manager

T: 707-782-0322

C: 707-695-3510

F: 707-598-0660

Nothing will work, unless you do. ~Maya Angelou

www.linkedin.com/in/StephMVD